



UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

October 2024 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROHAN SANDEEP RANE,
aka "ROHAN,"

"rogawd,"

"god rohan,"

"tradlordd,"

"witchking,"

"Rohaana is the godddddd,"

"rodawg,"

COLLIN JOHN THOMAS WALKER,
aka "WRATH,"

"CVLLIN,"

"O9A.WRATH,"

"ghoblins,"

"sadb-y,"

"maedeeznuts,"

KALEB CHRISTOPHER MERRITT,
aka "eTerror,"

"o9a.evil,"

"evil,"

"The Chariot,"

"sociopath," and

CLINT JORDAN LOPAKA NAHOOIKAIKA
BORGE,

aka "Whoops,"

"Jordan,"

Defendants.

CR No. 2:25-cr-00040-HDV

I N D I C T M E N T

[18 U.S.C. § 2252A(g): Engaging in
a Child Exploitation Enterprise;
18 U.S.C. § 2253: Criminal
Forfeiture]

1 The Grand Jury charges:

2 INTRODUCTORY ALLEGATIONS

3 At times relevant to this Indictment:

4 A. THE CHILD EXPLOITATION ENTERPRISE

5 1. Defendants ROHAN SANDEEP RANE, also known as ("aka")
6 "rogawd," aka "tradlordd," aka "witchking," aka "Rohaam is the
7 godddddd," aka "rodawg" ("RANE"), COLIN JOHN THOMAS WALKER, aka
8 "WRATH," aka "CVLLIN," aka "O9A.WRATH," aka "ghoblins," aka "sadb-y,"
9 aka "maedeeznuts" ("WALKER"), KALEB CHRISTOPHER MERRITT, aka
10 "eTerror," aka "o9a.evil," aka "The Chariot," aka "sociopath"
11 ("MERRITT"), and CLINT JORDAN LOPAKA NAHOOIKAIKA BORGE, aka "Whoops,"
12 aka "Jordan" ("BORGE"), were members of an Internet-based group known
13 as CVLT, the purpose of which was, among other things, the production
14 of, enticement to produce, advertisement of, receipt of, distribution
15 of, possession of, and access with intent to view child pornography,
16 as defined in Title 18, United States Code, Section 2256(8)(a) (the
17 "CVLT Exploitation Enterprise," or "CVLT"). CVLT operated in Los
18 Angeles and San Bernardino Counties, within the Central District of
19 Los Angeles, and elsewhere.

20 2. CVLT was dedicated to, among other interests, online child
21 sexual exploitation. CVLT members worked collectively to entice and
22 coerce children to self-produce child pornography on servers
23 associated with and run by CVLT on a platform known as "Platform D"
24 and elsewhere online.

25 3. CVLT members participated in their online child
26 exploitation activities because they wanted to create an army of
27 sadist followers. On these "Platform D" servers and elsewhere
28 online, CVLT members would seek to groom children for eventual

1 production of child pornography through various means of degradation.
2 This included coercing children to engage in dehumanizing acts (e.g.,
3 cutting and eating their own hair or calling themselves CVLT's
4 "slaves"), self-harm (e.g., carving with razor blades CVLT members'
5 names into their skin), and exposing children to extremist and
6 violent content (e.g., displaying videos of animals being tortured to
7 death and women being raped). For children who resisted, CVLT
8 members would threaten to "SWAT," "dox," or distribute the child
9 pornography or the child and their family's personally identifiable
10 information to the public. For children who refused, CVLT would
11 sometimes carry through on their threats.

12 4. CVLT espoused neo-Nazism, nihilism, and pedophilia as its
13 core principles, in addition to others, and exposed children to
14 material depicting and promoting these principles. This included
15 repeated uses of Nazi symbols and language and the distribution of
16 bondage, discipline, sadist, and masochistic ("BDSM") and gore child
17 pornography.

18 5. Defendants RANE, WALKER, MERRITT, and BERGE were members of
19 CVLT. Defendant RANE joined CVLT at least as early as 2020 and used
20 the usernames "rogawd," "tradlord," "witchking," "Rohaana is the
21 godddddd," and "rodawg." Defendant WALKER joined CVLT at least as
22 early as 2020 and used the usernames "WRATH," "CVLLIN," "09A.WRATH,"
23 "ghoblins," "sadb-y," and "maedeeznuts." Defendant MERRITT joined
24 CVLT at least as early as 2020 and used the usernames aka "eTerror,"
25 "o9a.evil," "The Chariot," and "sociopath." Defendant BERGE joined
26 CVLT at least as early as 2020 and used the usernames "Whoops" and
27 "Jordan."
28

1 6. Defendants RANE, WALKER, and MERRITT additionally acted as
2 leaders and administrators of CVLT, including by hosting and running
3 CVLT servers or directing others to do so, controlling membership in
4 CVLT, controlling access to CVLT extortion video chats and other
5 materials, and directing and instructing victims during the creation
6 of CVLT extortion videos and other materials.

7 7. CVLT included other coconspirators both known and unknown
8 to the Grand Jury, in the Central District of California and
9 elsewhere, including, but not limited to: Coconspirator R.M., a minor
10 male CVLT member using the usernames "Goonz Angel" and "Deal with the
11 Devil" ("Coconspirator R.M."); and Minor Victim 13, both a
12 coconspirator and minor female victim of CVLT using the username
13 "Kalina" ("Minor Victim 13").

14 B. MEANS AND METHODS OF THE CVLT ENTERPRISE

15 8. Among the means and methods by which defendants RANE,
16 WALKER, MERRITT, and BERGE, and other CVLT members, conducted and
17 participated in the conduct of the affairs of the CVLT Child
18 Exploitation Enterprise were the following:

19 a. CVLT members invited children to servers associated
20 with and run by CVLT on Platform D.

21 b. Once on a such server, CVLT members would groom the
22 children to participate in self-producing child pornography by, for
23 example, but not limited to:

24 i. exploiting existing vulnerabilities, such as
25 mental health challenges or prior sexual abuse to break down
26 children's willpower and resistance,

27 ii. degrading children, such as telling a Black child
28 to call herself "slave" and "[N-word]",

1 iii. offering to "protect" the children from other
2 online predators,

3 iv. encouraging children to harm themselves and
4 others, in order to desensitize them to extreme and violent acts,
5 such as punching themselves, hanging themselves with belts, engaging
6 in sexual or violent acts with their pets, and - eventually -
7 escalating to killing themselves on livestream,

8 v. exposing children to violent and extremist
9 context, such as animals being tortured and crushed to death, women
10 being raped, and BDSM and gore child pornography, and

11 vi. promoting extreme philosophies such as neo-
12 Nazism, nihilism, anarchy, pedophilia, rape, and lawlessness.

13 c. Having degraded and groomed the children, CVLT members
14 would then knowingly employ, use, persuade, induce, entice, and
15 coerce children to self-produce child pornography and self-harm.
16 This child pornography sometimes included use of pets or other
17 children, or insertion of foreign objects like knives or cacti into
18 their genitals.

19 d. For example, on or about September 15, 2021,
20 Coconspirator R.M. and Minor Victim 13 conspired to produce child
21 pornography of herself (Minor Victim 13) and a prepubescent child,
22 Minor Victim 14. Minor Victim 13 filmed at least two videos
23 depicting child pornography of Minor Victim 14 and distributed the
24 child pornography to Coconspirator R.M. Minor Victim 13 was in San
25 Bernardino County, within the Central District of Los Angeles, at the
26 time she conspired with Coconspirator R.M. to produce child
27 pornography and at the time she produced and distributed the child
28 pornography. Minor Victim 14 was in San Bernardino County, within

1 the Central District of California, at the time Minor Victim 13
2 produced child pornography of her.

3 e. Once CVLT members had obtained the child pornography
4 from child victims, they would often try to coerce the children to
5 produce more child pornography, threatening to release the existing
6 child pornography to the child's friends and family - or the public -
7 if the child did not produce more child pornography. Other times,
8 CVLT members would reveal they knew the child's true identity and
9 location, and would threaten to "SWAT" or "dox" the child.

10 f. CVLT members would discuss child sexual exploitation,
11 including encouraging other members to coerce the children to engage
12 in more extreme, violent, and degrading behavior, and also encouraged
13 others associated with CVLT to do the same. They also discussed the
14 potential of being apprehended and how to evade detection by law
15 enforcement.

[18 U.S.C. § 2252A(g) (2)]

9. The Grand Jury realleges paragraphs 1-8 of this Indictment here.

10. Beginning in at least 2019, and continuing through in or about 2022, in Los Angeles and San Bernardino Counties, within the Central District of California, and elsewhere, defendants RANE, WALKER, MERRITT, and BERGE, and others known and unknown to the Grand Jury, knowingly and willfully engaged in a child exploitation enterprise, that is, the commission of a series of felony violations enumerated in Title 18, United States Code, Section 2252A(g) (2), constituting at least three separate incidents involving more than one victim. The felony violations committed by the defendants in concert with one another and other members of CVLT include, but are not limited to, the following:

MINOR VICTIM 16 (DEFENDANT BERGE)

11. Beginning on an unknown date, and continuing to an unknown date in 2019, defendant BERGE used a facility and means of interstate and foreign commerce, namely, the Internet, to knowingly persuade, induce, entice, and coerce a person who had not yet attained the age of 18 years, namely Minor Victim 16, to engage in sexual activity for which a person can be charged with a criminal offense, namely, production of child pornography, in violation of Title 18, United States Code, Section 2251(a).

12. Beginning on an unknown date, and continuing to an unknown date in 2019, defendant BERGE knowingly employed, used, persuaded, induced, enticed, and coerced a minor, namely Minor Victim 16, to engage in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2) (A), for the purpose of producing a

1 visual depiction of such conduct, knowing and having reason to know
2 that such visual depiction would be transported and transmitted using
3 any means and facility of interstate and foreign commerce and in
4 affecting interstate and foreign commerce.

5 MINOR VICTIM 5 (DEFENDANT RANE)

6 13. Beginning on an unknown date, and continuing to an unknown
7 date in 2020, defendant RANE used a facility and means of interstate
8 and foreign commerce, namely, the Internet, to knowingly persuade,
9 induct, entice, and coerce a person who had not yet attained the age
10 of 18 years, namely Minor Victim 5, to engage in sexual activity for
11 which a person can be charged with a criminal offense, namely,
12 production of child pornography, in violation of Title 18, United
13 States Code, Section 2251(a).

14 14. Beginning on an unknown date, and continuing to an unknown
15 date in 2020, defendant RANE knowingly employed, used, persuaded,
16 induced, enticed, and coerced a minor, namely Minor Victim 5, to
17 engage in sexually explicit conduct, as defined in Title 18, United
18 States Code, Section 2256(2)(A), for the purpose of producing a
19 visual depiction of such conduct, knowing and having reason to know
20 that such visual depiction would be transported and transmitted using
21 any means and facility of interstate and foreign commerce and in
22 affecting interstate and foreign commerce.

23 MINOR VICTIM 2 (DEFENDANTS RANE, WALKER, AND MERRITT)

24 15. Beginning on an unknown date, and continuing to an unknown
25 date in 2020, defendants RANE, WALKER, and MERRITT used a facility
26 and means of interstate and foreign commerce, namely, the Internet,
27 to knowingly persuade, induce, entice, and coerce a person who had
28 not yet attained the age of 18 years, namely Minor Victim 2, to

1 engage in sexual activity for which a person can be charged with a
2 criminal offense, namely, production of child pornography, in
3 violation of Title 18, United States Code, Section 2251(a).

4 16. Beginning on an unknown date, and continuing to an unknown
5 date in 2020, defendants RANE, WALKER, and MERRITT knowingly
6 employed, used, persuaded, induced, enticed, and coerced a minor,
7 namely Minor Victim 2, to engage in sexually explicit conduct, as
8 defined in Title 18, United States Code, Section 2256(2)(A), for the
9 purpose of producing a visual depiction of such conduct, knowing and
10 having reason to know that such visual depiction would be transported
11 and transmitted using any means and facility of interstate and
12 foreign commerce and in affecting interstate and foreign commerce.

13 MINOR VICTIM 8 (DEFENDANT RANE)

14 17. Beginning on an unknown date, and continuing to an unknown
15 date in 2020, defendant RANE used a facility and means of interstate
16 and foreign commerce, namely, the Internet, to knowingly persuade,
17 induce, entice, and coerce a person who had not yet attained the age
18 of 18 years, namely Minor Victim 8, to engage in sexual activity for
19 which a person can be charged with a criminal offense, namely,
20 production of child pornography, in violation of Title 18, United
21 States Code, Section 2251(a).

22 18. Beginning on an unknown date, and continuing to an unknown
23 date in 2020, defendant RANE knowingly employed, used, persuaded,
24 induced, enticed, and coerced a minor, namely Minor Victim 8, to
25 engage in sexually explicit conduct, as defined in Title 18, United
26 States Code, Section 2256(2)(A), for the purpose of producing a
27 visual depiction of such conduct, knowing and having reason to know
28 that such visual depiction would be transported and transmitted using

1 any means and facility of interstate and foreign commerce and in
2 affecting interstate and foreign commerce.

3 MINOR VICTIM 3 (DEFENDANTS RANE, WALKER, AND MERRITT)

4 19. Beginning on an unknown date, and continuing to an unknown
5 date in 2020, defendants RANE, WALKER, and MERRITT used a facility
6 and means of interstate and foreign commerce, namely, the Internet,
7 to knowingly persuade, induce, entice, and coerce a person who had
8 not yet attained the age of 18 years, namely Minor Victim 3, to
9 engage in sexual activity for which a person can be charged with a
10 criminal offense, namely, production of child pornography, in
11 violation of Title 18, United States Code, Section 2251(a).

12 20. Beginning on an unknown date, and continuing to an unknown
13 date in 2020, defendants RANE, WALKER, and MERRITT knowingly
14 employed, used, persuaded, induced, enticed, and coerced a minor,
15 namely Minor Victim 3, to engage in sexually explicit conduct, as
16 defined in Title 18, United States Code, Section 2256(2)(A), for the
17 purpose of producing a visual depiction of such conduct, knowing and
18 having reason to know that such visual depiction would be transported
19 and transmitted using any means and facility of interstate and
20 foreign commerce and in affecting interstate and foreign commerce.

21 MINOR VICTIM 10 (DEFENDANTS RANE and WALKER)

22 21. Beginning on an unknown date, and continuing to an unknown
23 date in 2020, defendants RANE and WALKER used a facility and means of
24 interstate and foreign commerce, namely, the Internet, to knowingly
25 persuade, induce, entice, and coerce a person who had not yet
26 attained the age of 18 years, namely Minor Victim 10, to engage in
27 sexual activity for which a person can be charged with a criminal
28

1 offense, namely, production of child pornography, in violation of
2 Title 18, United States Code, Section 2251(a).

3 22. Beginning on an unknown date, continuing to an unknown date
4 in 2020, defendants RANE and WALKER knowingly employed, used,
5 persuaded, induced, enticed, and coerced a minor, namely Minor Victim
6 10, to engage in sexually explicit conduct, as defined in Title 18,
7 United States Code, Section 2256(2)(A), for the purpose of producing
8 a visual depiction of such conduct, knowing and having reason to know
9 that such visual depiction would be transported and transmitted using
10 any means and facility of interstate and foreign commerce and in
11 affecting interstate and foreign commerce.

12 MINOR VICTIM 7 (DEFENDANT RANE)

13 23. Beginning on an unknown date, and continuing to an unknown
14 date in 2021, defendant RANE used a facility and means of interstate
15 and foreign commerce, namely, the Internet, to knowingly persuade,
16 induce, entice, and coerce a person who had not yet attained the age
17 of 18 years, namely Minor Victim 7, to engage in sexual activity for
18 which a person can be charged with a criminal offense, namely,
19 production of child pornography, in violation of Title 18, United
20 States Code, Section 2251(a).

21 24. Beginning on an unknown date, and continuing to an unknown
22 date in 2021, defendant RANE knowingly employed, used, persuaded,
23 induced, enticed, and coerced a minor, namely Minor Victim 7, to
24 engage in sexually explicit conduct, as defined in Title 18, United
25 States Code, Section 2256(2)(A), for the purpose of producing a
26 visual depiction of such conduct, knowing and having reason to know
27 that such visual depiction would be transported and transmitted using
28

1 any means and facility of interstate and foreign commerce and in
2 affecting interstate and foreign commerce.

3 MINOR VICTIM 4 (DEFENDANTS RANE, MERRITT, and BERGE)

4 25. Beginning on an unknown date, and continuing to an unknown
5 date in 2020, defendants RANE and MERRITT used a facility and means
6 of interstate and foreign commerce, namely, the Internet, to
7 knowingly persuade, induce, entice, and coerce a person who had not
8 yet attained the age of 18 years, namely Minor Victim 4, to engage in
9 sexual activity for which a person can be charged with a criminal
10 offense, namely, production of child pornography, in violation of
11 Title 18, United States Code, Section 2251(a).

12 26. Beginning on an unknown date, and continuing to an unknown
13 date in 2020, defendants RANE and MERRITT knowingly attempted to
14 employ, use, persuade, induce, entice, and coerce a minor, namely
15 Minor Victim 4, to engage in sexually explicit conduct, as defined in
16 Title 18, United States Code, Section 2256(2)(A), for the purpose of
17 producing a visual depiction of such conduct, knowing and having
18 reason to know that such visual depiction would be transported and
19 transmitted using any means and facility of interstate and foreign
20 commerce and in affecting interstate and foreign commerce.

21 27. Beginning on an unknown date, and continuing to an unknown
22 date in 2021, defendant BERGE used a facility and means of interstate
23 and foreign commerce, namely, the Internet, to knowingly persuade,
24 induce, entice, and coerce a person who had not yet attained the age
25 of 18 years, namely Minor Victim 4, to engage in sexual activity for
26 which a person can be charged with a criminal offense, namely,
27 production of child pornography, in violation of Title 18, United
28 States Code, Section 2251(a).

1 28. Beginning on an unknown date, and continuing to an unknown
2 date in 2021, defendant BORGE knowingly employed, used, persuaded,
3 induced, enticed, and coerced a minor, namely Minor Victim 4, to
4 engage in sexually explicit conduct, as defined in Title 18, United
5 States Code, Section 2256(2) (A), for the purpose of producing a
6 visual depiction of such conduct, knowing and having reason to know
7 that such visual depiction would be transported and transmitted using
8 any means and facility of interstate and foreign commerce and in
9 affecting interstate and foreign commerce.

10 MINOR VICTIM 6 (DEFENDANTS RANE, WALKER, and MERRITT)

11 29. Beginning on an unknown date, and continuing to an unknown
12 date in 2021, defendants RANE, WALKER, and MERRITT used a facility
13 and means of interstate and foreign commerce, namely, the Internet,
14 to knowingly persuade, induce, entice, and coerce a person who had
15 not yet attained the age of 18 years, namely Minor Victim 6, to
16 engage in sexual activity for which a person can be charged with a
17 criminal offense, namely, production of child pornography, in
18 violation of Title 18, United States Code, Section 2251(a).

19 30. Beginning on an unknown date, and continuing to an unknown
20 date in 2021, defendants RANE, WALKER, and MERRITT knowingly
21 employed, used, persuaded, induced, enticed, and coerced a minor,
22 namely Minor Victim 6, to engage in sexually explicit conduct, as
23 defined in Title 18, United States Code, Section 2256(2) (A), for the
24 purpose of producing a visual depiction of such conduct, knowing and
25 having reason to know that such visual depiction would be transported
26 and transmitted using any means and facility of interstate and
27 foreign commerce and in affecting interstate and foreign commerce.

1 MINOR VICTIM 9 (DEFENDANT BORGE)

2 31. Beginning on an unknown date, and continuing to an unknown
3 date in 2021, defendant BORGE used a facility and means of interstate
4 and foreign commerce, namely, the Internet, to knowingly persuade,
5 induce, entice, and coerce a person who had not yet attained the age
6 of 18 years, namely Minor Victim 9, to engage in sexual activity for
7 which a person can be charged with a criminal offense, namely,
8 production of child pornography, in violation of Title 18, United
9 States Code, Section 2251(a).

10 32. Beginning on an unknown date, and continuing to an unknown
11 date in 2021, defendant BORGE knowingly employed, used, persuaded,
12 induced, enticed, and coerced a minor, namely Minor Victim 9, to
13 engage in sexually explicit conduct, as defined in Title 18, United
14 States Code, Section 2256(2)(A), for the purpose of producing a
15 visual depiction of such conduct, knowing and having reason to know
16 that such visual depiction would be transported and transmitted using
17 any means and facility of interstate and foreign commerce and in
18 affecting interstate and foreign commerce.

19 MINOR VICTIM 11 (DEFENDANTS RANE and BORGE)

20 33. Beginning on an unknown date, and continuing to an unknown
21 date in 2021, defendants RANE and BORGE used a facility and means of
22 interstate and foreign commerce, namely, the Internet, to knowingly
23 persuade, induce, entice, and coerce a person who had not yet
24 attained the age of 18 years, namely Minor Victim 11, to engage in
25 sexual activity for which a person can be charged with a criminal
26 offense, namely, production of child pornography, in violation of
27 Title 18, United States Code, Section 2251(a).

1 34. Beginning on an unknown date, and continuing to an unknown
2 date in 2021, defendants RANE and BERGE knowingly employed, used,
3 persuaded, induced, enticed, and coerced a minor, namely Minor Victim
4 11, to engage in sexually explicit conduct, as defined in Title 18,
5 United States Code, Section 2256(2)(A), for the purpose of producing
6 a visual depiction of such conduct, knowing and having reason to know
7 that such visual depiction would be transported and transmitted using
8 any means and facility of interstate and foreign commerce and in
9 affecting interstate and foreign commerce.

10 MINOR VICTIM 11 (DEFENDANT BERGE)

11 35. Beginning on an unknown date, and continuing to an unknown
12 date in 2021, defendant BERGE used a facility and means of interstate
13 and foreign commerce, namely, the Internet, to knowingly persuade,
14 induce, entice, and coerce a person who had not yet attained the age
15 of 18 years, namely Minor Victim 11, to engage in sexual activity for
16 which a person can be charged with a criminal offense, namely,
17 production of child pornography, in violation of Title 18, United
18 States Code, Section 2251(a).

19 36. Beginning on an unknown date, and continuing to an unknown
20 date in 2021, defendant BERGE knowingly employed, used, persuaded,
21 induced, enticed, and coerced a minor, namely Minor Victim 11, to
22 engage in sexually explicit conduct, as defined in Title 18, United
23 States Code, Section 2256(2)(A), for the purpose of producing a
24 visual depiction of such conduct, knowing and having reason to know
25 that such visual depiction would be transported and transmitted using
26 any means and facility of interstate and foreign commerce and in
27 affecting interstate and foreign commerce.

1 MINOR VICTIMS 13 and 14 (DEFENDANT BORGE and UNINDICTED CVLT
2 COCONSPIRATORS)

3 37. Beginning on or about August 15, 2021, and continuing
4 through on or about August 16, 2021, an unindicted coconspirator CVLT
5 coconspirator used a facility and means of interstate and foreign
6 commerce, namely, the Internet, to knowingly persuade, induce,
7 entice, and coerce a person who had not yet attained the age of 18
8 years, namely Minor Victim 13, to engage in sexual activity for which
9 a person can be charged with a criminal offense, namely, production
10 of child pornography, in violation of Title 18, United States Code,
11 Section 2251(a).

12 38. Beginning on an unknown date, and continuing to an unknown
13 date in 2021, defendant BORGE knowingly employed, used, persuaded,
14 induced, enticed, and coerced minors, namely Minor Victim 13 and
15 Minor Victim 14, to engage in sexually explicit conduct, as defined
16 in Title 18, United States Code, Section 2256(2)(A), for the purpose
17 of producing a visual depiction of such conduct, knowing and having
18 reason to know that such visual depiction would be transported and
19 transmitted using any means and facility of interstate and foreign
20 commerce and in affecting interstate and foreign commerce.

FORFEITURE ALLEGATION

[18 U.S.C. § 2253]

1. Pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure, notice is hereby given that the United States of America will seek forfeiture as part of any sentence, pursuant to Title 18, United States Code, Section 2253, in the event of any defendant's conviction of the offense set forth in this Indictment.

2. Any defendant so convicted shall forfeit to the United States of America the following property:

(a) All right, title, and interest in any visual depiction involved in any such offense, or any book, magazine, periodical, film videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received and involved in any such offense;

(b) All right, title, and interest in any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense;

(c) All right, title, and interest in any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property; and

(d) To the extent such property is not available for forfeiture, a sum of money equal to the total value of the property described in subparagraphs (a), (b), and (c).


3. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b), the defendant, if so convicted, shall forfeit substitute property, up to the total value of the property described in the preceding paragraph

1 if, as the result of any act or omission of the defendant, the
2 property described in the preceding paragraph, or any portion
3 thereof: (a) cannot be located upon the exercise of due diligence;
4 (b) has been transferred, sold to or deposited with a third party;
5 (c) has been placed beyond the jurisdiction of the court; (d) has
6 been substantially diminished in value; or (e) has been commingled
7 with other property that cannot be divided without difficulty.

8
9 A TRUE BILL

10
11 /s/
12 Foreperson

13 E. MARTIN ESTRADA
14 United States Attorney

15 
16 LINDSEY GREER DOTSON
17 Assistant United States Attorney
Chief, Criminal Division

18 JOSHUA O. MAUSNER
19 Assistant United States Attorney
20 Chief, Violent & Organized Crime
Section

21 CATHARINE A. RICHMOND
22 Assistant United States Attorney
Violent & Organized Crime Section